

MONTGOMERY Y. PAEK, ESQ., Bar # 10176
ETHAN D. THOMAS, ESQ., Bar # 12874
EMIL S. KIM, ESQ., Bar # 14894
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, NV 89169-5937
Telephone: 702.862.8800
Fax No.: 702.862.8811
Email: mpaek@littler.com
Email: edthomas@littler.com
Email: ekim@littler.com

Attorneys for Defendant
CITY OF HENDERSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KELLY WOODBURN, THOMAS
WOODBURN, and JOSHUA
RODRIGUEZ individually and on behalf
of all others similarly situated,

Plaintiffs,

vs.

CITY OF HENDERSON; DOES I through
V, inclusive; and ROE CORPORATIONS
I through V, inclusive,

Defendants.

Case No. 2:19-cv-01488-JAD-VCF

**STIPULATION FOR EXTENSION OF TIME
FOR DEFENDANT TO FILE A REPLY IN
SUPPORT OF ITS MOTION TO COMPEL
ARBITRATION OF CERTAIN CLAIMS AND
TO DISMISS THE ENTIRETY OF
PLAINTIFFS' SECOND AMENDED
COMPLAINT**

ECF No. 69

Plaintiffs KELLY WOODBURN, THOMAS WOODBURN, and JOSHUA RODRIGUEZ (collectively "Plaintiffs"), and Defendant CITY OF HENDERSON ("Defendant"), by and through their respective counsel of record, do hereby stipulate and request an order extending the time for Defendant to file a Reply in support of its July 19, 2021 Motion to Compel Arbitration of Certain Claim and to Dismiss the Entirety of Plaintiff's Second Amended Complaint (ECF No. 60 & 61). Specifically, the parties stipulate to extend the deadline by two weeks from the current deadline of September 22, 2021 up to and including **October 6, 2021**.

This extension is requested and sought prior to the expiration of the deadline in question and is needed to accommodate the recent birth of Defense Counsel Emil Kim's child, and his subsequent leave of absence. This is the second extension requested related to this deadline.¹ The parties agree and represent to the Court that this request is made in good faith and not for the purpose of delay.

Dated: September 10, 2021

Dated: September 10, 2021

CLAGGETT & SYKES LAW FIRM

LITTLER MENDELSON, P.C.

By: /s/ Joseph N. Mott

JOSEPH N. MOTT, ESQ.

By: /s/ Ethan D. Thomas

MONTGOMERY Y. PAEK, ESQ.

ETHAN D. THOMAS, ESQ.

EMIL S. KIM, ESQ.

Attorneys for Plaintiffs

KELLY WOODBURN, THOMAS
WOODBURN, AND JOSHUA
RODRIGUEZ

Attorneys for Defendant
CITY OF HENDERSON

ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: September 17, 2021

4821-9399-2954.1 / 080828-1020

¹ The parties previously stipulated to extend Plaintiffs' deadline to respond to the respective motions and that stipulation included a reciprocal extension request for Defendant's Reply deadline. ECF No. 64. Plaintiffs' respective oppositions to the motions were filed on September 1, 2021. ECF No. 67 and 68.